

IN THE UNITED STATES DISTRICT COURT  
MIDDLE DISTRICT OF ALABAMA  
EASTERN DIVISION

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VICTOR SMITH,

Plaintiff,

vs.

EURO-PRO MANAGEMENT  
SERVICES, INC.,

Defendant.


Case No. 3:05-cv-1186-MEF

TERESA P. HACKETT, CLERK  
U.S. DISTRICT COURT  
MIDDLE DISTRICT ALA

**PLAINTIFF'S SUBMISSIONS IN OPPOSITION TO  
DEFENDANT'S MOTION FOR SUMMARY JUDGMENT**

Comes now the Plaintiff, and in opposition to the Defendant's Motion for  
Summary Judgment, submits the following:

1. A copy of the deposition of the Plaintiff, Victor Smith.
2. A copy of the deposition of the Euro-Pro corporate representative, Ralph  
Hudnall (including Plaintiff's Exhibits 5, 6, 8 and 10 to the deposition).
3. Declaration of Allison Rhodes Lott.

  
John I. Cottle III (COT004)  
Attorney for Plaintiff

OF COUNSEL:  
Bowles & Cottle  
Attorneys at Law  
P.O. Box 780397  
2 South Dubois Avenue  
Tallahassee, Alabama 36078  
(334) 283-6548  
Fax: (334) 283-5366  
(Email) [BowlesandCottle@aol.com](mailto:BowlesandCottle@aol.com)

**CERTIFICATE OF SERVICE**

I hereby certify that I have served a copy of the foregoing on Warren B. Lightfoot, Jr., Esquire, Maynard, Cooper & Gale, P.C., 1901 Sixth Avenue North, 2400 AmSouth/Harbert Plaza, Birmingham, Alabama 35203-2618, attorney for Defendant, by mailing a copy thereof, postage prepaid, to him at his property mailing address on this the 28~~th~~ day of November, 2006.

  
Of Counsel